

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	:
Plaintiff,	:
v.	:
MARLON QUAN, <i>et al.</i>,	:
Defendants.	:

**DEFENDANTS' MOTION TO EXCLUDE EXPERT
OPINION TESTIMONY OF MICHAEL MAYER
AND OF THIRTEEN FACT WITNESSES**

Pursuant to Federal Rules of Evidence 404 and 701-703, Defendants Marlon Quan, Acorn Capital Group, LLC, Stewardship Investment Advisors, LLC, and ACG II LLC respectfully request that the Court grant their Motion to Exclude Expert Opinion Testimony of Michael Mayer and of Thirteen Fact Witnesses.

Wherefore, Defendants respectfully request that the Court grant their motion.

Dated: June 20, 2013

Respectfully submitted,

Laura Schwalbe

Bruce E. Coolidge (Reg. No. 278952)
Laura Schwalbe (Reg. No. 1011907)
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Ave, NW
Washington, D.C. 20006
(202) 663-6000
bruce.coolidge@wilmerhale.com
laura.schwalbe@wilmerhale.com
(admitted *pro hac vice*)

Sanket Bulsara (Reg. No. 4181640)
Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
sanket.bulsara@wilmerhale.com
(admitted *pro hac vice*)

Attorneys for Defendants